

There are three reasons the FCC should implement WNP without further delay:

1) The widespread speculation over whether or not the FCC will extend the November 24th implementation deadline (and if so, by how much), is not good for the industry nor the economy. The uncertainty promoted by the FCC's silence on what carriers can expect - drives carriers to hedge their investment dollars instead of directing them to productive uses benefiting themselves and consumers (ie. spending on WNP and affiliated service innovations or spending on other things).

2) While carriers indicate that the wireless industry is already highly competitive, the FCC should recognize that number portability is all about changing the playing field, introducing new dimensions to the services carriers can offer, and enabling the industry to evolve.

Note that the landline replacement market is in its infancy. Also note that companies/business users of wireless are typically unable to change carriers to take advantage of services offered by providers other than their own. There are business opportunities for carriers to pursue that are uniquely enabled by WNP. These opportunities are the basis for service innovations that will benefit consumers. This is a win-win.

3) WNP alleviates pressure on the number scarcity issue in the industry. By allowing wireless users to keep their numbers when changing carriers, instead of having to return them and receive a new one, the industry more effectively utilizes TNs and amplifies the benefits that number pooling will bring.

The FCC should direct the industry to decisively implement WNP without further delay. Given the confusion being caused by the silence on the issue, the FCC should consider providing very limited schedule relief to carriers.

For example, the FCC could provide day-for-day relief, retroactive to January 1, 2002. Announcing its direction no later than the end of February would allow the FCC to give the industry 2 months of relief over the currently in place November 24 mandate.

Respectfully,
T. Roosevelt

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